

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Court File No. _____

In the Matter of the Petition of

Wells Fargo Bank, N.A.;

in Relation to Certificate of Title
No. 59023 issued for land in the
County of Washington and State of
Minnesota and legally described as
follows:

**NOTICE OF REMOVAL OF
ACTION TO FEDERAL COURT**

The East One hundred forty-five (145) feet
of the South Eighty-six and twenty-five
hundredths (86.25) feet of Lot Fourteen
(14), COUNTY AUDITOR'S PLAT
NUMBER 1, as surveyed and platted and
now on file and of record in the office of
the Registrar of Titles of Washington
County, Minnesota,

Petitioner,

v.

Laurie A. Hayes, USAA Federal
Savings Bank, United States of
America (United States Department
of Treasury - Internal Revenue
Service), and Parties in Possession
of the Premises,

Respondents.

Respondent, United States of America (United States Department of Treasury -
Internal Revenue Service), (hereinafter "United States"), by its attorneys B. Todd Jones, the
United States Attorney for the State and District of Minnesota, and Roylene A. Champeaux,

Assistant United States Attorney, hereby gives notice to the petitioner Wells Fargo Bank, N.A. and to the State Court as follows:

1. That the United States is the respondent in a civil action now pending in the Tenth Judicial District, County of Washington, State of Minnesota, entitled In the matter of the Petition of Wells Fargo Bank, N.A. in Relation to Certificate of Title No. 59023, and that trial has not yet been had therein.

2. That the above-entitled action was commenced against the respondent United States by service of the Order to Show Cause and Petition on the Office of the United States Attorney for the District of Minnesota on or about October 17, 2011. Copies of all process and pleadings served on the respondent United States are attached hereto as Exhibits A, B and C (Order to Show Cause, Petition and Report of Examiner). This notice of removal is filed within the 30 days required by 28 U.S.C. §1446(b).

3. The petition in the State Court action was filed on or about August 31, 2011.

4. This notice of removal is filed pursuant to 28 U.S.C. §§ 1441(a), 1442(a)(1) and 1444. The State Court action is a proceedings subsequent to initial registration action seeking to quiet title and determine lien priorities with respect to real property encumbered by one (1) federal tax lien. Petitioner seeks to quiet title and determine lien priorities.

5. The United States has given written notice of the filing of this notice of removal to all parties named in this action by serving them by mail with a copy thereof, and has concurrently filed a copy of this notice with the Court Administrator for the Tenth Judicial District, Washington County District Court, State of Minnesota, pursuant to 28 U.S.C. § 1446(d).

WHEREFORE, notice is hereby given that the said action is removed from the State Court into this Court for trial or such other determination as this Court may make regarding the action in accordance with its jurisdictional limits under 28 U.S.C. §§ 1441, 1442 and 1444 and in accordance with Fed. R. Civ. P. 81(c).

Respectfully submitted,

Dated: November 4, 2011

B. TODD JONES
United States Attorney

/e/ Roylene A. Champeaux
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Attorneys for the Respondent
United States of America (United States
Department of Treasury - Internal
Revenue Service)

Roylene A. Champeaux, declares under penalty of perjury as provided by 28 U.S.C. §1746, that she is an Assistant United States Attorney for the District of Minnesota and represents the federal respondent named herein; that she has read the foregoing notice and knows the contents thereof; that the same is true of her own knowledge, except as to any matters stated therein on information and belief and as to those matters she believes them to be true.

Dated: November 4, 2011

/e/ Roylene A. Champeaux
ROYLENE A. CHAMPEAUX
Assistant United States Attorney